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   SPECTRUM LABORATORIES, LLC
11
                            UNITED STATES DISTRICT COURT
12
                             FOR THE DISTRICT OF NEVADA
   AIM HIGH INVESTMENT GROUP, LLC,
                                                            2:22-cv-00158-GMN-DJA
                                                  Case No.
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             Plaintiff/Counter-Defendant,
                                                 JOINT MOTION FOR EXTENSION OF
                                                 TIME TO RESPOND
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                                                 (First Request)
   SPECTRUM LABORATORIES, LLC
             Defendant/Counterclaimant.
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          The Parties jointly move to extend their briefing deadlines related to two Aim High motions:
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   Aim High's Motion to Strike (ECF #24) and Motion to Compel (ECF #25) as follows:
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          Spectrum moves to have its January 13, 2023 deadline related to Aim High's Motion to
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- Compel by two weeks to noon (12:00 p.m.) Eastern Time on January 27, 2023.
- Aim High moves to have its reply deadlines moved by one week: January 27 for its reply to Spectrum's opposition to its Motion to Strike (ECF #24) and (should the Court grant Spectrum's motion to extend) February 10 for its reply to Spectrum's opposition to its Motion to Compel (ECF #25).

This is the first request for extensions of time sought by the parties with respect to each of these deadlines. Good cause exists for these extensions. The additional two weeks allows Spectrum

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and its attorneys to investigate Aim High's motion to compel to minimize any issues and prepare a response, if needed, that addresses only what issues remain. Also, good cause exists because Aim High served additional discovery on December 18, 2022 that are due by January 17, 2023, for which Spectrum did not have sufficient time to address the above due to the Christmas and New Year's holidays and numerous conflicting schedules during that time. Further, Spectrum's counsel also has had complex Federal Circuit appeal and District Court briefing that took a substantial amount of time to complete. In fairness, Spectrum agreed to allow Aim High additional time to respond to its oppositions to avoid prejudice on any party or counsel.

This extension is not at all sought for delay or for any other improper purpose, but rather is requested due to a genuine need for more time. Plaintiff Aim High consents to the motion, and no other deadlines will be impacted, no party would be prejudiced by the granting of it. Therefore, the Court should grant this motion and allow the extensions listed above.

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1 2	Dated: January 12, 2023	Respectfully submitted,
3		/s/ David B. Cupar
4	/s/ Ryan Gile (by consent) RYAN GILE, ESQ. (NBN 8807)	David B. Cupar (admitted <i>pro hac vice</i>) Matthew J. Cavanagh (admitted <i>pro hac vice</i>)
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16	Tel: 248-433-7393	
17	Attorneys for Plaintiff/Counter-Defendant	
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23		IT IS SO ORDERED:
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25		UNITED STATES MAGISTRATE JUDGE
		DATED: 1/17/2023
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